

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re

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: Chapter 9

CITY OF DETROIT, MICHIGAN,

: Case No. 13-53846

Debtor.

: Hon. Steven W. Rhodes

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**STIPULATION FOR AN ORDER AUTHORIZING THE  
CITY AND THE RETIREE COMMITTEE TO FILE UNDER  
SEAL SETTLEMENT AGREEMENT RESOLVING CORRECTED  
MOTION OF THE OFFICIAL COMMITTEE OF RETIREES FOR ENTRY  
OF AN ORDER ALLOWING AN ADMINISTRATIVE EXPENSE CLAIM**

The City of Detroit, Michigan (the "City") and the Official Committee of Retirees of the City of Detroit, Michigan (the "Retiree Committee" and, together with the City, the "Parties"), by and through each of their undersigned counsel, stipulate as follows:

1. On February 7, 2014, the Retiree Committee filed the Corrected Motion of the Official Committee of Retirees for Entry of an Order Allowing an Administrative Expense Claim (Docket No. 2660) (the "Administrative Expense Request"). The Administrative Expense Request amended and superseded the Motion of the Official Committee of Retirees for Entry of an Order Allowing an

Administrative Expense Claim (Docket No. 2656), filed by the Retiree Committee on February 6, 2014.

2. On February 20, 2014, the City filed the Debtor's Objection to Corrected Motion of Official Committee of Retirees for Entry of an Order Allowing an Administrative Expense Claim and an accompanying brief in opposition (Docket Nos. 2705 and 2706) (together, the "Objection").

3. On February 28, 2014, the Retiree Committee filed the Reply in Support of Motion of the Official Committee of Retirees for an Order Allowing an Administrative Expense Claim and in Response to City's Opposition Thereto (Docket No. 2782) (the "Reply").

4. The Court conducted an initial hearing with respect to the relief requested in the Administrative Expense Request on March 5, 2014, at 10:00 a.m., Eastern Time (the "Hearing").

5. Following the Hearing, the Parties have resolved the Administrative Expense Request, the Objection and the Reply pursuant to the terms of a Settlement Agreement (the "Settlement Agreement").

6. As part of the resolution of the Administrative Expense Request, the Objection and the Reply, the Parties agreed to request that the Court permit the filing under seal of the Settlement Agreement in order to further protect

the members of the Retiree Committee and the City from frivolous, vexatious or harassing litigation.

7. Accordingly, the Parties have agreed to, and request that the Court enter, the order attached hereto as Exhibit 1.

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Dated: March 25, 2014

/s/ Sam J. Alberts

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ATTORNEYS FOR THE CITY

**EXHIBIT 1**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
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In re

CITY OF DETROIT, MICHIGAN,

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**ORDER AUTHORIZING THE CITY AND THE  
RETIREE COMMITTEE TO FILE UNDER SEAL  
SETTLEMENT AGREEMENT RESOLVING CORRECTED  
MOTION OF THE OFFICIAL COMMITTEE OF RETIREES FOR ENTRY  
OF AN ORDER ALLOWING AN ADMINISTRATIVE EXPENSE CLAIM**

This matter coming before the Court on the Stipulation for an Order Authorizing the City and the Retiree Committee to File Under Seal Settlement Agreement Resolving Corrected Motion of the Official Committee of Retirees (the "Stipulation"),<sup>1</sup> filed jointly by the City of Detroit, Michigan (the "City") and the Official Committee of Retirees of the City of Detroit, Michigan (the "Retiree Committee" and, together with the City, the "Parties"); the Court being advised that the Parties have agreed to request that the Court permit the filing under seal of the Settlement Agreement as part of the resolution of the Administrative Expense

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Stipulation.

Request, the Objection and the Reply; the Court having reviewed the Stipulation; the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b) and (c) cause exists justifying the filing under seal of the Settlement Agreement; and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The Stipulation is APPROVED.
2. Pursuant to section 107 of title 11 of the United States Code, the Parties are authorized to file and maintain the Settlement Agreement under seal.

**CERTIFICATE OF SERVICE**

I, Heather Lennox, hereby certify that the foregoing Stipulation for an Order Authorizing the City and the Retiree Committee to File Under Seal Settlement Agreement Resolving Corrected Motion of the Official Committee of Retirees was filed and served via the Court's electronic case filing and noticing system on this 25th day of March, 2014.

/s/ Heather Lennox